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MICHELLE LECHUGA, individually and)	
on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 19-cv-05989
v.)	Hon. Rebecca R. Pallmeyer
)	
GREAT AMERICAN POWER, LLC,)	
)	
Defendant)	
)	

Defendant Great American Power, LLC (“Great American”), by and through its undersigned attorneys, hereby respectfully moves this Court for an extension of time to answer or otherwise respond to the putative class action complaint filed by Plaintiff Michelle Lechuga (“Plaintiff”). In support of this motion, which is unopposed, Great American states as follows:

1. Plaintiff filed the complaint in this action on September 9, 2019.
2. Great American was served with the complaint on September 13, 2019, making its answer or other response to the complaint due today, October 11, 2019.
3. The parties have been engaged in meaningful discussions and an exchange of information in the pursuit of an early resolution of this matter, and there is a substantial likelihood that this matter will be resolved within the next few weeks.
4. Great American respectfully requests that the Court grant it a 28-day extension from today – that is, until November 8, 2019 – to answer or otherwise respond to the complaint.

5. It is Great American's expectation that the requested extension will permit the parties to reach a resolution of this matter before Great American is required to expend significant resources responding to the complaint.

6. This is Great American's first request for an extension of time in this matter and, as set forth above, the requested extension is not sought for any improper purpose.

7. Great American has conferred with Plaintiff's counsel regarding the requested extension, and Plaintiff's counsel has no objection to the requested extension.

WHEREFORE, Defendant Great American Power, LLC respectfully requests that the Court grant this motion and thereby extend the time for it to answer or otherwise respond to the complaint to November 8, 2019.

Respectfully submitted,

GREAT AMERICAN POWER, LLC

By: /s/ Livia M. Kiser
Livia M. Kiser
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Livia M. Kiser, hereby certify that I caused a copy of the foregoing Defendant Great American Power, LLC's Unopposed Motion to Extend Time to Answer or Otherwise Respond to Complaint to be served upon the following counsel of record by ECF/Pacer on this 11th day of October 2019:

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/s/ Livia M. Kiser